

## **REMARKS**

The Office Action dated November 18, 2004 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1 and 9 have been amended. No new matter has been added, and no new issues are raised which require further consideration and/or search. Claims 1-10 are submitted for consideration.

Claim 1 was objected to because of informalities. Claim 1 has been amended to overcome this objection. Therefore, Applicants respectfully request that the objection be withdrawn.

Claims 1-10 were rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent 5,483,585 to Parker et al. The rejection is traversed as being based on a reference that neither teaches nor suggests the novel combination of features clearly recited in independent claims 1 and 6, and/or any claims dependent therefrom.

Claim 1, upon which claims 2-5 depend, recites a method for the management of subscriber functions. The method is used to manage subscriber functions in a telecommunication network. The subscriber functions are stored in records. The method includes the steps of defining one or more default function sets, each default function set including one or more subscriber functions of a digital telephone exchange defined as default functions and partitioning subscribers of the digital telephone exchange into

default subscribers and special subscribers. The default subscribers are those subscribers whose subscriber functions correspond to one of the default function sets and the special subscribers are those subscribers whose subscriber functions do not correspond to any of the default function sets. The method also includes the steps of storing subscriber functions consistent with the default function sets in default records, each default record being common to all the default subscribers whose subscriber functions correspond to the subscriber functions in the default record concerned and storing subscriber functions for each special subscriber in subscriber-specific records, each subscriber-specific record being specific to the special subscriber concerned. The method further includes the steps of reading the subscriber functions for each default subscriber from the default record concerned and reading the subscriber functions for each special subscriber from the subscriber-specific record for the subscriber concerned.

Claim 6, upon which claims 7-10 depend, recites a system for the management of subscriber functions. The system includes a telecommunication network. The system also includes subscriber functions for subscribers in the telecommunication network and a number of records, in which the subscriber functions are stored. The system includes one or more default records in which subscriber functions consistent with default function sets are stored and from which the subscriber functions for default subscribers are read and one or more subscriber-specific records in which the subscriber functions for each special subscriber are stored and from which they are read.

As will be discussed below, the cited prior art reference of Parker et al. fails to disclose or suggest the elements of any of the presently pending claims.

Parker et al teaches a telecommunications system that includes a local exchange or switch, an element manager for the exchange and a configuration manager for the element manager. Col. 2, lines 50-53. The element manager and the configuration manager operate in what is known as an object-oriented environment. Col. 3, lines 23-25. The object class of the element manager includes a CUSTOMER-PROFILE, a DIRECTORY-NUMBER, an ACCESS-PORT, CUSTOMIZED RESOURCES, CALL-FORWARDING, THREE PARTY AND CALL WAITING. Each instance of the CUSTOMER-PROFILE represents the data of a particular customer or subscriber of the exchange. Col. 3, line 59- Col. 4, line 10. When it is desired to configure the element manager so as to provide a new customer with basic telephone services, or provide an existing customer with a supplementary service, or remove a supplementary service or basic telephony services from an existing customer, instances of various object classes used in the element manager are created or modified as appropriate. Col. 5, lines 2-30. For each existing customer, an instance of the customer profile object is stored in an object store 31. Col. 5, lines 21-26. After receiving a request for data on a specified customer, the instance of the CUSTOMER-PROFILE object is retrieved from the object store 31 for the specified customer. The instance includes the data on the customer which is then displayed. Col. 6, lines 15-30. If a user wishes to create a new customer, the user enters the information

associated with the customer and a new instance of the CUSTOMER-PROFILE object is created. Col. 6, lines 31-39.

Applicant respectfully submits that Parker et al. does not teach or suggest the elements of each of the presently pending claims. Specifically, Parker et al. fails to teach or suggest, as recited in the present claims, a default record, i.e., a record in which subscriber functions consistent with default function set are stored, wherein the default record is common to all the default subscribers whose subscriber functions correspond to the subscriber function in the default record concerned and each of the default function sets includes one or more subscriber functions of a digital telephone exchange defined as default functions. Claim 1, in part, recites defining one or more default function sets, each default function set comprising one or more subscriber functions of a digital telephone exchange defined as default functions; partitioning subscribers of the digital telephone exchange into default subscribers, the default subscribers are those subscribers whose subscriber functions correspond to one of the default function sets. Claims 1 and 6, in part, also recite one or more default records in which subscriber functions consistent with default function sets are stored and from which the subscriber functions for default subscribers are read, each default record being common to all the default subscribers whose subscriber functions correspond to the subscriber functions in the default record concerned.

Parker et al. discloses customers with basic telephone services and customers with supplementary telephone services. The customers with the basic telephony service in

Parker et al. might correspond with the claimed default subscribers and the customers with the supplementary telephony services might correspond with the claimed special subscribers. However, contrary to the assertion in the Office Action, Parker et al. merely discloses the conventional prior art arrangement of storing and reading information about the services of all customers in a customer specific manner. Specifically, Parker et al. teach storing and reading information about the services of the customers with basic telephony services in a customer specific manner, i.e., separately for each and every customer with basic telephony services. The portions of Parker et al. cited by the Office Action in no way disclose or suggest a single default record into which information about the service of a plurality of customers with basic telephony services are stored, nor do these portions suggest a single default record from which information about the service of a plurality of customers with basic telephony services are read. For example, col. 8 lines 4-21 of Parker et al. specifically discloses creating a new instance of CUSTOMER-PROFILE and a new instance of CUSTOMIZED-RESOURCES for a new customer with basic telephony service. If a default record in accordance with the present invention were utilized by Parker et al., there would be no need to create any new instance of the CUSTOMER-PROFILE or CUSTOMIZED-RESOURCES for the new customer because the information contained in the CUSTOMER-PROFILE and the CUSTOMIZED-RESOURCES could be read from an already existing default record. Furthermore, Col. 5, lines 21-26 of Parker et al. specifically disclose that a new instance of the object class CUSTOMER-PROFILE is created for each new customer.

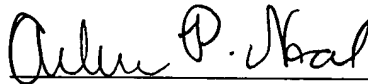
Furthermore, it seems questionable whether the object store 31 of Parker et al. and the associated object classes can be read upon the subscriber record of the present invention. "Subscriber record" is in itself a well-known and established term in the art which refers to a record in a telephone exchange for storing subscriber functions. In contrast, the object store 31 of Parker et al. appears to be some kind of temporary storage associated with an element manager for managing configuration operations of a telecommunications switch. Therefore, Applicant respectfully asserts that the rejection under 35 U.S.C. §102(b) should be withdrawn because Parker et al. does not teach or suggest each feature of claims 1 and 6 and hence, dependent claim 2-5 and 7-10 thereon.

As noted previously, claims 1-10 recite subject matter which is neither disclosed nor suggested in the prior art references cited in the Office Action. It is therefore respectfully requested that all of claims 1-10 be allowed and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Arlene P. Neal", is written over a horizontal line.

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